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September 27, 2023

BY ECF

Hon. Lorna G. Schofield, U.S.D.J. United States District Court Southern District of New York 500 Pearl Street New York, New York 10007 MANHATTAN OFFICE

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Application **GRANTED**. By **October 18, 2023**, Plaintiff's counsel shall submit evidence providing a factual basis for the attorney's fees award, including "contemporaneous billing records documenting, for each attorney, the date, the hours expended, and the nature of the work done." *See Wolinsky v. Scholastic Inc.*, 900 F. Supp. 2d 332, 336 (S.D.N.Y. 2012).

Dated: September 27, 2023 New York, New York

Re: Erin Larkin, et al. v. Sailaway NY, et al., 22 CV 10737

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Dear Judge Schofield:

Concerning Your Honor's Order dated September 19, 2023 (ECF Document 37), the undersigned respectfully requests a brief extension of time to comply therewith. I am currently engaged in trial preparation, as I am scheduled to try a civil case before the Honorable Frederic Block in the Eastern District of New York that commences on Monday, October 2, 2023 in the matter of <u>Jane Doe v. New York City Department of Education, et al.</u>, 21 CV 4332 (FB)(RML). As such, I have not yet had sufficient time to respond to the September 19th Order. This is the undersigned's first request for an extension, and defense counsel has no objection thereto.

Accordingly, the undersigned respectfully requests an extension of time until Wednesday, October 18, 2023, as the trial is expected to last two weeks.

The undersigned thanks the Court for its time and consideration.

Respectfully Submitted,

Karl J. Ashanti, Esq. Musa-Obregon Law, P.C.